

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	CHAPTER 11
)	(Jointly Administered)
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-01139 (JKF)
)	
Debtors.)	Re: Docket No. 23972
)	

**ERRATA SHEET FOR ANDERSON MEMORIAL
HOSPITAL'S POST-TRIAL BRIEF ON ITS OBJECTIONS TO
CONFIRMATION OF DEBTORS' FIRST AMENDED JOINT PLAN**

Anderson Memorial Hospital hereby files this errata sheet identifying typographical errors to record citations referenced in its *Post-Trial Brief on its Objections to Confirmation of Debtors' First Amended Joint Plan* (D.I. 23972) filed December 8, 2009, and hereby states the correct record citations in bold as follows:

- Pg. 3, record citation to “at least four papers in which Grace stated that Anderson would be able to return to the tort system” is changed to [DI 587 at pp. 47-48; DI 688 at pp. 1-5; DI 688 Ex. A at p. 3; DI 1665 at p. 12] (from [DI 586 at pp. 47-48; DI 688 at pp. 1-5; DI 688 Ex. A at p. 3; DI 1665 at p. 12]).
- Pg. 3, case citation is corrected to In re Asbestos School Litigation, 104 F.R.D. 422, 425 (E.D. Pa. 1984), aff'd in part and vacated in part, 789 F.2d 996 (3d Cir. 1986), **cert. denied, 479 U.S. 852, 915 (1986)** (from In re Asbestos School Litigation, 104 F.R.D. 422, 425 (E.D. Pa. 1984), aff'd in part and vacated in part, 789 F.2d 996 (3d Cir. 1986)).
- Pg. 4, record citation to February 25, 2005 hearing transcript is changed to [DI 1793, **2/25/02** Hearing Tr., p. 98] (from [DI 1793, 2/25/05 Hearing Tr., p. 98]).
- Pg. 4, case citation is corrected to In re First Interregional Equity Corp., 227 B.R. 358 (D.N.J. 1998) (from In re Interregional Equity Corp., 227 B.R. 358 (D.N.J. 1998)).
- Pg. 12, record citation to ACM in schools is changed to **49** C.F.R. 8450 (from 40 C.F.R. 8450).
- Pgs. 12-13, case citation is corrected to In re Asbestos School Litigation, 104 F.R.D. 422, 425 (E.D. Pa. 1984), aff'd in part and vacated in part, 789 F.2d 996 (3d Cir. 1986), **cert. denied, 479 U.S. 852, 915 (1986)** (from In re Asbestos School Litigation, 104 F.R.D. 422, 425 (E.D. Pa. 1984), aff'd in part and vacated in part, 789 F.2d 996 (3d Cir. 1986)).
- Pg. 16, record citation to “at least four papers in which Grace stated that Anderson would be able to return to the tort system” is changed to [DI 587 at pp. 47-48; DI 688 at pp. 1-5; DI 688 Ex. A at p. 3; DI 1665 at p. 12] (from [DI 586 at pp. 47-48; DI 688 at pp. 1-5; DI 688 Ex. A at p. 3; DI 1665 at p. 12]).

- Pg. 16, record citation to establishment of a property damage “Bar Date” is changed to [DI 1665] (from [DI 1664]).
- Pg. 17, record citation regarding Revised CMO Motion is changed to [DI 1665] (from [DI 1664]).
- Pg. 18, record citation regarding approval of Grace’s proposed Bar Date Notice is changed to [DI 1665] (from [DI 1664]).
- Pg. 24, record citation to the appeal was rejected as interlocutory is changed to [DI 2554] (from [DI 2254]).
- Pg. 26, page citation to February 23, 2004 hearing transcript is corrected to [DI 5381, 2/23/04 Hearing Tr., p. 18] (from [DI 5381, 2/23/04 Hearing Tr., p. ____]).
- Pg. 31, the discovery date quoted from Grace’s Motion to Extend Exclusivity is corrected to “The schedule currently being discussed extends through at least February 15, 2006.” (from “The schedule currently being discussed extends through at least February 16, 2006.”)
- Pg. 33, record citation relating to Grace’s repeatedly representation that the ten claims had been selected “randomly” is changed to [DI 9207, Ex. 1; DI 9349, 8/29/05 Hearing Tr. at 17-19; DI 11025, 10/31/05 Hearing Tr. at 7] (from [DI 9207, 8/19/05 Hearing Tr. at 1; DI 9349, 8/29/05 Hearing Tr. at 17-19; DI 11025, 10/31/05 Hearing Tr. at 7]).
- Pg. 39, record citation to Authority Stipulation is corrected to [DI 9002; DI 9141, Ex. 2] (from [DI 9002, Ex. 2, DI 9141]).
- Pg. 44, subheading is changed to **E**. The August 29, 2005 Hearing (from **H**. The August 29, 2005 Hearing).
- Pg. 44, typographical errors and omission of record citation are corrected to read as follows: On August 19, 2005, Grace moved for leave to file a Reply in support of the 12th Omnibus Objections, further carrying on its attack on S&R. [DI 9206] Grace also filed on **July 18, 2005** a motion for limited waiver of Local Rules in order to permit the filing of omnibus objections to 2,938 claims filed by S&R. [DI 9008] **[NOTE]**: The pleadings for DI 9008 and DI 9206 were hyperlinked together as one document under DI 9186].
- Pg. 45, subheading is changed to **F**. The October 31, 2005 Hearing (from **I**. The October 31, 2005 Hearing).
- Pg. 49, omission of record citation to (Class 7A CMO Paragraph II.C.1.) is corrected to (Class 7A CMO Paragraph II.C.1.) [DI 20668, Ex. 25].

In addition, Anderson Memorial Hospital omitted to include the Table of Contents and Table of Authorities to its brief, a copy of which is attached hereto for reference purposes.

DATED: December 28, 2009

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